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To: Mary Abrams
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Sent: 4/29/2016 6:00:44 PM
Subject: Mariana eight spot butterfly at the MPMG range
Attachments: Northwest Field P-735 - 8-Spot Butterfly Constraints (Occupied Berm Zoom) 20160427.pdf

Mary,

This e-mail re-confirms our communication on April 8, 2016, during which we indicated that we are able to avoid three of the nine locations of the Mariana eight-spot butterfly in the northwest corner of the MPMG range, as they are outside of the construction footprint. The other six locations of the Mariana eight spot butterfly are within the potential direct impact area of the MPMG range. We had previously indicated that since we have not conducted full site investigations, topographic surveys, geotechnical investigations, MEC surveys, and development of the design we cannot yet determine the actual grades for the range and if the 25-ft (8 m) tall impact berm at the far end of the range can reasonably be constructed so as to omit the remaining six locations from the project footprint. However, based on your conversation with Dan Cecchini on Tuesday, April 26th, we have reviewed the footprint for the MPMG. Recalling that the Final SEIS and the Biological Assessment expressly state that the maps of the live-fire training range complex are "notional," in order to move the proposed action forward, this notional dimension enables us to further commit to adjusting the boundary for constructability purposes to avoid the remaining six known locations of the Mariana eight spot butterfly in the northwest corner of the MPMG footprint. Please refer to the attached map for our revised project footprint, which reflects DON's commitment to avoid a total of nine locations.

In addition to this commitment, we would like to re-state for the record that we have included extensive minimization and conservation measures for the protection of the Mariana eight-spot butterfly, to include:

1. Contractor education programs;
2. Pre-construction butterfly and host plant surveys within suitable habitat within project boundaries;
3. Salvage host plant parts (not the entire plant) and provide them to an expert in the identification of the larvae or eggs of the Mariana eight spot butterfly for identification and propagation of Mariana eight-spot butterflies;
4. Planting of the Mariana eight-spot host plants within the 1,000 acre forest enhancement sites at Finegayan. The number of host plants that would be planted would be commensurate with the amount of host plants that are removed or developed over within the footprint of the LFTRC (it is our understanding that the propagation of the host plants [*Procris pedunculata* and *Elatostema calcareum*] has been successful; and
5. Host plant propagation, coupled with the ungulate fencing and eradication and the propagation of the butterflies by a species expert should provide a greater conservation benefit to the species than is being accomplished for the species to date, and fully minimizes the potential effects on the species from the military relocation.

In addition, the 5,234 acres that have been set aside for durable habitat protection to support native habitat restoration and land management for the survival and recovery of the Guam Micronesian kingfisher provide a conservation benefit to the known populations of Mariana eight-spot butterfly on DoD land [e.g., Tweed's Cave area (2 populations) on Finegayan, Tarague Basin on Andersen Air Force Base (AAFB), and the population in the eastern portion of AAFB (off of golf course near Anao)]. Lastly, there is a population on Orote Point which is part of the Orote Ecological Reserve Area.

Although DON has not had the opportunity to review and understand FWS's analysis on the Mariana eight-spot butterfly, DON believes the conservation measures listed above would go beyond minimizing the potential impact to the species, and will even further protect the species by improving or restoring enduring habitat on Guam.

If you have any questions or would like further clarification, please feel free to call or e-mail me. My contact information is below.

Thank you.

Coralie

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"It's not about what it is, it's about what it can become."